

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**United States' Response to the Court**

At the conference on Wednesday, February 12, the Court asked the United States to notify it today regarding whether the United States could agree to any portion of the proposed order filed by the Veasey plaintiffs embodied in the attachment at ECF 161-3.

The United States can agree to the entry of pages 1-10 of ECF 161-3. These provisions cover initial steps to begin the database work. They provide for the confidentiality of the database data, order the State of Texas to provide the State's data to the United States within one business day after entry of the order (paragraph 1), and direct the United States to provide its proposed search criteria for the database comparisons (referred to as "the algorithm") to all parties within 7 days after receiving the data from Texas (paragraph 5). For the court's convenience, we have attached the parts of ECF 161-3 that are agreed to at this time.

The United States' various motions, including the motions for supplemental protective order and motion to modify, remain pending. The United States has today begun what it hopes to be productive discussions with the other parties about the steps that should follow from these initial steps set forth at pages 1-10 of ECF 161-3. The United States will report to the court regarding these discussions in advance of the hearing currently scheduled for February 26.

As a consequence, the United States respectfully suggests that the court postpone the conference call scheduled for tomorrow.

Date: February 13, 2014

KENNETH MAGIDSON  
United States Attorney  
Southern District of Texas

Respectfully submitted,

JOCELYN SAMUELS  
Acting Assistant Attorney General  
Civil Rights Division

/s/ Elizabeth S. Westfall

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on the following counsel of record:

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